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September 20, 2024

The request for an extension beyond October 3, 2024 is denied. Defendant shall submit a letter by no later than October 3, 2024 as to why the Court should not order Defendant to delist the New York Apartment with such restraint to expire (with the possibility of renewal) on October 17, 2024.

Via ECF

Hon. Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

SO ORDERED.
Dated: October 2, 2024

Re: *Freeman et al v. Giuliani*, 24-mc-00353-LJL

Dear Judge Liman:

I write in response to the Court's order, entered this morning. ECF 35.

I was surprised by the content of Mr. Nathan's letter of last night. ECF 35. It had been my understanding that Plaintiffs *want* the New York Apartment sold and monetized. After reading the letter, counsel had a phone call to discuss this issue and numerous other issues relating to the turnover of property, both real and personal. Counsel had what I believe was a constructive discussion, which will continue after the upcoming holiday (which, of course, starts this evening). I assure the Court, as I assured Plaintiffs' counsel, that while those discussions continue, Defendant will take no further action with respect to the Apartment, its listing or delisting or marketing, and no further action that could be construed as interference or a violation of a restraining notice.

I respectfully suggest that no judicial action is necessary at this time. If, however, the Court requires a further submission from the defense, I respectfully ask the Court to fix a date for any such submission on October 6, 2024, or later.

Respectfully Submitted,

/s/ Kenneth A. Caruso
Kenneth A. Caruso

cc: Counsel of Record